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March 19, 1999

William Kennard, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

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Dear Chairman Kennard:

Federal Communications Commission
Office of Secretary

I am concerned about the Notice of Proposed Rulemaking which would establish a new class of FM broadcast service — "microradio".

We have owned these Athens stations since 1973. I know what coverage area our signals once occupied. I also know that today, our signals travel a much shorter distance. During this time, a variety of changes have been permitted which have caused increased interference.

Now, it appears that yet another relaxation of interference standards is going to be allowed. For what purpose?

When my father and I purchased these stations nearly 26 years ago, there were about 7,700 radio stations in the U.S. Today there are around 13,000. Our city is located in Ohio's least populated region — quite rural. And yet, on my desk radio I receive 18 stations during the daytime. How many are enough? In fact, in this region there are two signals which are "dark", no longer on the air. So why is it important to establish yet another classification of radio broadcast service?

It may be that some Commissioners would like to encourage additional opportunities for minorities to participate in ownership. Such owners might also offer the public the opportunity to hear additional points of view or programming. This is reasonable, if not commendable. But let's accomplish this with *preferences* as the ownership transfer process takes place with existing classes of broadcast service. Don't create a fourth-class service that new owners will ultimately resent and which will create greater interference with the already eroded signals of existing stations.

It might be argued that *microradio* could make a difference if it were to serve "pockets" of ethnic or economically-challenged populations. But these needs occur largely in metropolitan areas where existing stations are already fully occupying the spectrum.

Another source of personal concern for me goes back to when the Commission relaxed the limits on how many stations an entity may own.

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Eliminating those rules has lessened the opportunity for diversity. The small, "mom & pop", *locally* owned and operated station is rapidly disappearing. I would go to a meeting of the Ohio Association of Broadcasters and perhaps 120 owners would attend — each an integral part of their communities. And at last fall's OAB meeting I counted 20. Is this good public policy? Is it good to have one entity own 70-80 stations in a single state alone?

More is not always better. Please, fix what you already have first...

A handwritten signature in black ink, appearing to read "David W. Palmer", followed by a long horizontal line extending to the right.

David W. Palmer
President